

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

IN RE: BARBARA CATHALINE CALVERT  
Debtor

CASE NO. 23-30361  
CHAPTER 13

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TRUSTEE'S OBJECTION TO CONFIRMATION

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COMES NOW the Interim Chapter 13 Trustee, P. Chael, and for his Objection to Confirmation states as follows:

- 1) Trustee objects to confirmation pursuant to 11 U.S.C. § 521 as the plan provides for the 2017 Jeep Cherokee with Horizon Credit Union to be paid directly. The address for this entity is in Fresno, CA. Based on the debtor's bank statements, this is financed through Horizon Bank, which is local. The correct creditor does not have notice of this bankruptcy and the claims bar date will expire shortly. Proof is required that this payment is current.
- 2) Trustee objects to confirmation under 11 U.S.C. § 1325(a)(6) as the Plan provides to pay the mortgage with M&T Bank direct. Debtor must commit to pursuing all required 3002.1 litigation and provide proof this is current.

WHEREFORE, the Trustee objects to confirmation of the proposed Plan for failure to meet the requirements of 11 U.S.C. §1325(a) and (b).

Dated: June 1, 2023

Respectfully Submitted,

/s/ Katherine Iskin #33679-71  
Katherine Iskin, Counsel to  
P. Chael, Interim Chapter 13 Trustee  
Office of the Chapter 13 Trustee  
P.O. Box 11550

South Bend, IN 46634  
(574) 254-1313

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the attached was sent on June 1, 2023

By U.S. Mail to the Debtors and Debtors' Attorney as follows:

Debtor: Barbara Calvert, 11980 8<sup>th</sup> Street, Osceola, IN 46561

By electronic e-mail to the Debtors' Attorney and the U.S. Trustee

Debtor's Attorney: Candace Arroyo

U.S. Trustee: [ustpregion10.so.ecf@usdoj.gov](mailto:ustpregion10.so.ecf@usdoj.gov)

/s/ Suzanne Hall